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August 24, 2023

VIA ECF

The Honorable George B. Daniels  
United States District Judge  
U.S. District Court for the  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

SO ORDERED:

  
George B. Daniels, U.S.D.J.

Dated: AUG 25 2023

Andrew J. Calica  
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Re: ***Fund Liquidation Holdings, LLC, et al. v. UBS AG, et al. Case No. 15-cv-05844***

Dear Judge Daniels:

We are counsel for defendant Société Générale (“SG”) in the above-referenced action and write with the consent of counsel for plaintiff California Teachers’ Retirement System (“CalSTRS”). Pursuant to Your Honor’s Individual Rules and Practices, Rule I.D.1., and the Confidentiality Stipulation and Protective Order, ¶ 32 (Dkt. 599) entered by the Court in this action, the parties have been conferring regarding the materials that SG filed provisionally under seal in connection with its Motion to Dismiss the Second Amended Class Action Complaint Pursuant to the Doctrine of *Forum Non Conveniens* (Dkt. 702) (“Motion to Dismiss”).

The conferral process has been productive. Tomorrow, SG will unseal its memorandum of law (Dkt. 705) and Exhibits I and J to the Declaration of Andrew J. Calica, dated August 11, 2023, in support of SG’s Motion to Dismiss. Additionally, there is no disagreement between the parties on redactions proposed to Exhibits A and E and it is not contemplated that either party will be requesting that any document remain fully under seal. Nonetheless, the parties believe that a brief extension of the deadline to file any letter motions concerning proposed redactions will allow them to complete their conferrals concerning the remaining exhibits, and likely will enable the parties to make a combined submission to the Court setting forth their respective positions.

Accordingly, the parties jointly and respectfully request that the August 25, 2023 deadline for such letter motions (Dkt. 707) be extended through and including September 1, 2023. This is the first request for an extension of this deadline.

We thank the Court for its attention to this matter.

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Respectfully submitted,

/s/Andrew J. Calica

Andrew J. Calica

cc: All counsel of record (via ECF)